

To: Commissioner, S.S.A.  
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SIR:

In regards to your plans to review and revise the criteria used to determine whether someone has a mental impairment that is disabling. I would like to bring to your attention, the following points of interest. 1. The importance of recognizing evidence from all medical sources. Evidence from other sources regarding the severity of the impairment should not be treated differently when provided by licensed health professionals than when given by psychiatrist or psychologist. The organization of community mental health programs is such that an individual may see the psychiatrist rarely, and only to evaluate medications during a very brief visit. The people most familiar with the case and the individual claimant's functional limitations are therapists or psychiatric social workers who see the individual on a daily or weekly basis. Current regulations do not treat evidence from such sources as "medical evidence of record." even though it is prepared by a professional, included in the psychiatric case file and an integral part of a physician supervised treatment plan. SSA should treat such information as medical evidence when it comes from a licensed clinic or is part of a medically supervised treatment plan. To do otherwise is to treat low income claimants unfairly merely because they cannot afford treatment in a setting where most of the work is done by physicians. 2. Consideration of drug use as symptom of another mental impairment. Many individuals diagnosed with mental illness also have substance abuse problems. SSA's rules should provide clear guidance to adjudicators that the mere fact of substance abuse is not grounds for denying a claim. The current Introduction does not fully discuss how drug addiction and alcoholism (DAA) is to be evaluated under the Listings. Although the DAA provisions were last changed in 1996, SAA has not changed the Listings language. SAA should clarify that drug use may be a symptom of another mental impairment and a determination is required as to whether drug addiction or alcoholism is a contributing factor material to the determination of disability. 3. Effects of medication. For many individuals with mental illness, medication will treat the overt signs and symptoms (such as hallucinations) but not the resulting functional deficits (often termed negative symptoms). This means that some individuals on medication may no longer meet the A criteria regarding signs and symptoms (even though they have a diagnosis of they Listed disorder) but nonetheless meet the B criteria regarding function. The Introduction should clarify that when an individual meets the B criteria and they have the diagnosis cited in the A criteria they qualify, just as do others whose overt symptoms are not controlled with medication. There are many more items that should be reviewed carefully when changes are made these are but a few.

JC Cranford